

UNITED STATES DISTRICT COURT  
for the  
Central District of California

In the Matter of the Search of )  
Nine parcels sent by USPS Priority Mail and ) Case No. 2:25-MJ-01486  
currently in the custody of the United States )  
Postal Inspection Service )

**APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS**

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (*identify the person or describe the property to be searched and give its location*):

*See Attachment A*

located in the Central District of California, there is now concealed (*identify the person or describe the property to be seized*):

*See Attachment B*

The basis for the search under Fed. R. Crim. P. 41(c) is (*check one or more*):

- evidence of a crime;
- contraband, fruits of crime, or other items illegally possessed;
- property designed for use, intended for use, or used in committing a crime;
- a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. §§ 841(a)(1); 846; 843(b)	Distribution and possession with intent to distribute a controlled substance; conspiracy; use of communication facility, including mails, to facilitate distribution of controlled substances

The application is based on these facts:

*See attached Affidavit*

- Continued on the attached sheet.

*/s/ Jolisia Bennett, United States Postal Inspector*

*Applicant's signature*

Jolisia Bennett, United States Postal Inspector

*Printed name and title*

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: 3/14/2025

*Judge's signature*

City and state: Los Angeles, CA

Hon. Brianna F. Mircheff, U.S. Magistrate Judge

*Printed name and title*

AUSA: William Larsen (x0298)

**ATTACHMENT A**

**PARCELS TO BE SEARCHED**

The following United States Postal Service ("USPS") parcels seized from the mail stream on March 11, 2025, are currently in the custody of the United States Postal Inspection Service in Los Angeles, California:

a. **SUBJECT PARCEL 1** is a USPS Priority Mail parcel bearing tracking number 9405 5362 0624 9293 5366 78. **SUBJECT PARCEL 1** is a white colored, USPS Priority Mail Medium Flat Rate Box. **SUBJECT PARCEL 1** is addressed to "Jarvis Smith, 3042 E Bragstad Dr, Sioux Falls, SD 571103-4041." The return address listed on **SUBJECT PARCEL 1** is "Carole, Webber, 839 E Wisteria CT, Ontario, CA 91761." **SUBJECT PARCEL 1** was postmarked on March 11, 2025, in the 91761 zip code.

b. **SUBJECT PARCEL 2** is a USPS Priority Mail parcel bearing tracking number 9505 5161 9121 5070 9721 37. **SUBJECT PARCEL 2** is a white colored, Priority Mail Medium Flat Rate Box. **SUBJECT PARCEL 2** is addressed to "Jimmy, 2308 Grant St Apt #1, Hollywood, FL 33020-3468." The return address listed on **SUBJECT PARCEL 2** is "Claudia R., 7207 Rio Flora Pl, Downey, CA 90241." **SUBJECT PARCEL 2** was postmarked on March 11, 2025, in the 90241 zip code.

c. **SUBJECT PARCEL 3** is a USPS Priority Mail parcel bearing tracking number 9505 5161 9124 5070 19. **SUBJECT PARCEL 3** is a white colored, USPS Priority Mail Large Flat Rate Box. **SUBJECT PARCEL 3** is addressed to "Ms. Huh Nan Ok, 5346 Cabot Creek Dr, Sugar Hill, GA 30578." The return address listed on

**SUBJECT PARCEL 3** is "Sung Kim, 9330 Horley Ave, Downey, CA 90240." **SUBJECT PARCEL 3** was postmarked on March 11, 2025, in the 90241 zip code.

d. **SUBJECT PARCEL 4** is a USPS Priority Mail parcel bearing tracking number 9405 5362 0624 9293 5551 29. **SUBJECT PARCEL 4** is a brown colored, cardboard box. **SUBJECT PARCEL 4** is addressed to "Nic Quin, 124 N west St, York, PA 1740-3363." The return address listed on **SUBJECT PARCEL 4** is "Marie Janine, 1127 S Spaulding Ave Unit 301, Los Angeles, CA 90019." **SUBJECT PARCEL 4** was postmarked on March 11, 2025, in the 90019 zip code.

e. **SUBJECT PARCEL 5** is a USPS Priority Mail parcel bearing tracking number 9405 5362 0624 9293 5551 74. **SUBJECT PARCEL 5** is a brown colored, cardboard box. **SUBJECT PARCEL 5** is addressed to "Javier Jones, 6744 Burbage Landing Cir, Suffolk, VA 23435-3080." The return address listed on **SUBJECT PARCEL 5** is "Marie Janine, 1127 S Spaulding Ave Unit 301, Los Angeles, CA 90019." **SUBJECT PARCEL 5** was postmarked on March 11, 2025, in the 90019 zip code.

f. **SUBJECT PARCEL 6** is a USPS Priority Mail parcel bearing tracking number 9505 5138 0668 5069 8326 90. **SUBJECT PARCEL 6** is a white colored, USPS Priority Mail Large Flat Rate Box. **SUBJECT PARCEL 6** is addressed to "Nidza, P.O. Box 2320, Mayaguez, PR 00681." The return address listed on **SUBJECT PARCEL 6** is "Carlos M, 40-5923 Rd St, LIC, NY 11101." **SUBJECT PARCEL 6** was postmarked on March 10, 2025, in the 90280 zip code.

g. **SUBJECT PARCEL 7** is a USPS Priority Mail parcel

bearing tracking number 9505 5161 9124 5070 8083 96. **SUBJECT PARCEL 7** is a white colored, USPS Priority Mail Medium Flat Rate Box. **SUBJECT PARCEL 7** is addressed to "Huh Nan Ok, 5346 Cabot Creek Dr, Sugar Hill, GA 30578." The return address listed on **SUBJECT PARCEL 7** is "Sung Kim, 9330 Horley Ave, Downey, CA 90240." **SUBJECT PARCEL 7** was postmarked on March 11, 2025, in the 90241 zip code.

h. **SUBJECT PARCEL 8** is a USPS Priority Mail parcel bearing tracking number 9505 5145 5759 5070 6487 43. **SUBJECT PARCEL 8** is a white colored, USPS Priority Mail Large Flat Rate Box. **SUBJECT PARCEL 8** is addressed to "9908 Shining Willow, Street Middleton, WI 53562." The return address listed on **SUBJECT PARCEL 8** is "2338 Lincoln Park Ave, Los Angeles, CA 90031." **SUBJECT PARCEL 8** was postmarked on March 11, 2025, in the 90031 zip code.

i. **SUBJECT PARCEL 9** is a USPS Priority Mail parcel bearing tracking number 9205 5903 4784 2730 0046 6575 03 . **SUBJECT PARCEL 9** is a white colored, USPS Priority Mail Large Flat Rate Box. **SUBJECT PARCEL 9** is addressed to "Stacy Patterson, 2305 Camelia Dr, Statesboro, GA 30461-8040." The return address listed on **SUBJECT PARCEL 9** is "125 Curiosity, 305 N Coral Dr, Long Beach, CA 90803-2306." **SUBJECT PARCEL 9** was postmarked on March 05, 2025.

**ATTACHMENT B**

ITEMS TO BE SEIZED

The items to be seized are evidence, contraband, fruits, and instrumentalities of violations of Title 21, United States Code, Sections 841(a)(1) (distribution and possession with intent to distribute a controlled substance); 846 (conspiracy to distribute or possess with intent to distribute a controlled substance); and 843(b) (unlawful use of a communication facility, including the mails, to facilitate the distribution of a controlled substance) (the "**Subject Offenses**"), namely:

- a. Any controlled substances, including marijuana;
- b. Currency, money orders, bank checks, or similar monetary instruments in aggregate quantities over \$1,000;
- c. All records or documents related to or establishing the identities of co-conspirators, customers, and third-party sources of controlled substances; and
- c. Parcel wrappings, identification documents, and any associated packaging material.

**AFFIDAVIT**

I, Jolisia Bennett, being duly sworn, declare and state as follows:

**I. PURPOSE OF AFFIDAVIT**

1. This affidavit is made in support of an application for a warrant to search the following nine United States Postal Service ("USPS") Priority Mail parcels in the custody of the United States Postal Inspection Service ("USPIS") in Los Angeles, California, within the Central District of California (collectively, the "**SUBJECT PARCELS**"), as described more fully in Attachment A:

a. A USPS Priority Mail parcel bearing tracking number 9405 5362 0624 9293 5366 78 ("**SUBJECT PARCEL 1**");

b. A USPS Priority Mail parcel bearing tracking number 9505 5161 9121 5070 9721 37 ("**SUBJECT PARCEL 2**");

c. A USPS Priority Mail parcel bearing tracking number 9505 5161 9124 5070 8084 19 ("**SUBJECT PARCEL 3**");

d. A USPS Priority Mail parcel bearing tracking number 9405 5362 0624 9293 5551 29 ("**SUBJECT PARCEL 4**");

e. A USPS Priority Mail parcel bearing tracking number 9405 5362 0624 9293 5551 74 ("**SUBJECT PARCEL 5**");

f. A USPS Priority Mail parcel bearing tracking number 9505 5138 0668 5069 8326 90 ("**SUBJECT PARCEL 6**");

g. A USPS Priority Mail parcel bearing tracking number 9505 5161 9124 5070 8083 96 ("**SUBJECT PARCEL 7**");

h. A USPS Priority Mail parcel bearing tracking number 9505 5145 5759 5070 6487 43 ("**SUBJECT PARCEL 8**"); and

i. A USPS Priority Mail parcel bearing tracking number 9205 5903 4784 2730 0046 6575 03 ("SUBJECT PARCEL 9").

2. The requested search warrant seeks authorization to seize evidence, fruits, and instrumentalities of violations of Title 21, United States Code, Sections 841(a)(1) (distribution and possession with intent to distribute a controlled substance); 846 (conspiracy to distribute or possess with intent to distribute a controlled substance); and 843(b) (unlawful use of a communication facility, including the mails, to facilitate the distribution of a controlled substance) (the "Subject Offenses"), as described more fully in Attachment B.

Attachments A and B are incorporated by reference herein.

3. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

### **II. TRAINING AND EXPERIENCE**

4. I am a United States Postal Inspector with the United States Postal Inspection Service ("USPIS") and have been so employed since August 2021. I have completed a 16-week basic training course in Potomac, Maryland, which included training in the investigation of drug trafficking via the United States Mail

I am currently assigned to the USPIS Los Angeles Division, Contraband Interdiction and Investigations ("CI2") team. The CI2 team is responsible for investigating drug trafficking violations, including those covered under Title 21 of the United States Code (Controlled Substances) involving the United States Mail. As such, I am an "investigative or law enforcement officer" of the United States within the meaning of Title 18, United States Code, Section 2510(7); that is, an officer of the United States empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Title 18, United States Code, Section 2516.

5. The USPIS is the primary investigative arm of the United States Postal Service ("USPS") and is charged under Title 18, United States Code, Section 3061 with the enforcement of laws governing the use and movement of the United States Mail, including the misuse and fraudulent schemes involving the mail, crimes relating to mail fraud, narcotics trafficking, and identity theft involving the United States Mail.

6. I have participated in multiple investigations into violations of the Controlled Substances Act involving the USPS and discussed my investigations with other experienced law enforcement officers. During my employment, I have written affidavits in support of complaints and search warrants, and executed numerous federal arrests, both as part of my own investigations and assisting in other investigations. For these reasons, I am familiar with how drug traffickers use the mail to facilitate their trafficking.

7. Through training, experience, and discussion with fellow United States Postal Inspectors, I am familiar with various methods of smuggling and trafficking controlled substances and the proceeds from sale of such substances.

**III. SUMMARY OF PROBABLE CAUSE**

8. On March 11, 2025, during routine parcel inspections at the USPS Los Angeles Processing and Distribution Center in Los Angeles County, California, U.S. Postal Inspectors Jolisia Bennett, Adam Bardaro, Zera Poirier, and Cotelia Bond-Young (the "Postal Inspectors") identified the **SUBJECT PARCELS** as meeting some of the following criteria common to packages containing contraband, including that they were excessively taped, contained handwritten labels, lacked business account numbers, and, according to law enforcement databases, contained some sender and recipient names that were not associated with their respective listed addresses.

9. After the **SUBJECT PARCELS** were initially identified, on March 12, 2025, a trained drug detection dog alerted to each of the **SUBJECT PARCELS** for the presence of drugs or other items, such as the proceeds of drug sales that have been contaminated by drugs.

**IV. STATEMENT OF PROBABLE CAUSE**

**A. Background on Use of Mails for Drug Trafficking**

10. Based on my training and experience I know the following:

a. Postal Inspectors have been conducting investigations of drug trafficking via USPS Express Mail and

Priority Mail since the mid-1980s. In the early 1990s, Postal Inspectors in Los Angeles, California, began conducting organized interdictions of Priority Mail Express and Priority Mail parcels suspected of containing controlled substances and proceeds from the sale of controlled substances. Postal Inspectors also regularly examined and investigated Priority Mail Express and Priority Mail parcels. During the 1990s, Postal Inspectors observed that the trend was for drug traffickers to send controlled substances and proceeds from the sale of controlled substances, in the form of cash, using boxes.

b. Although Postal Inspectors still see boxes used to send for controlled substances and cash, there has been a gradual change over the years toward the current trend of using smaller boxes, flat cardboard envelopes, and Tyvek envelopes, with proceeds from the sale of controlled substances converted to money orders. By using money orders, drug traffickers are able to send large dollar amounts in compact form, using much smaller conveyances, which lend a sense of legitimacy to the parcel's appearance.

c. Los Angeles is a significant source area for controlled substances. Controlled substances are frequently transported from the Los Angeles area via US Mail, and the proceeds from the sale of controlled substances are frequently returned to the Los Angeles area via US Mail. These proceeds are generally in the form of money orders, bank checks, or similar monetary instruments in an amount over \$1,000. Based on my training and experience, I know that proceeds from the sale of

controlled substances often contain the odor of drugs because they have been contaminated by or associated with the odor of one or more drugs.

d. Drug distributors often use USPS Priority Mail Express, which is the USPS overnight/next day delivery mail product, or Priority Mail Service, which is the USPS two-to-three-day delivery mail product. Drug distributors use the Priority Mail Express delivery service because of its speed, reliability, and the ability to track the parcel's progress to delivery. Drug distributors use the Priority Mail delivery service because it provides them more time for travel between states if they decide to follow their shipments to their destination for distribution. Also, by adding delivery confirmation to a Priority Mail parcel, drug traffickers have the ability to track the parcel's progress to the intended delivery point, as if the parcel had been mailed using the Priority Mail 2-Day Service.

11. The following indicia suggest that a parcel may contain drugs or drug distribution proceeds:

- a. The parcel is contained in a Large Flat Rate cardboard box;
- b. The parcel bears a handwritten or typed label, whether USPS Express Mail or Priority Mail;
- c. The handwritten or typed label on the parcel does not contain a business account number;
- d. The seams of the parcel are all taped or glued shut;

e. The parcel emits an odor of a cleaning agent or adhesive or spray foam that can be detected by a human; and

f. Multiple parcels are mailed by the same individual, on the same day, from different locations.

12. Parcels exhibiting such indicia may be subject to further investigation, which may include verification of the addressee and return addresses.

13. I know from my training and experience that drug traffickers often use fictitious or incomplete names and addresses in an effort to conceal their identities from law enforcement officers investigating these types of cases. To the extent that real addresses are ever used, it is only to lend a legitimate appearance to the parcel and is almost always paired with a false name.

**B. Initial Investigation of the SUBJECT PARCELS**

14. On March 11, 2025, during routine parcel inspections at the USPS Los Angeles Processing and Distribution Center in Los Angeles County, California, Postal Inspectors determined that the **SUBJECT PARCELS** met some of the initial suspicious characteristics as described above. Specifically, Postal Inspectors determined the following:

a. **SUBJECT PARCEL 1** is a USPS Priority Mail parcel bearing tracking number 9405 5362 0624 9293 5366 78. **SUBJECT PARCEL 1** is a white colored, USPS Priority Mail Medium Flat Rate Box. **SUBJECT PARCEL 1** does not contain a business account number. According to law enforcement records, the return address listed on **SUBJECT PARCEL 1** - "839 E Wisteria CT,

Ontario, CA 91761" - appears to be a legitimate address but is not associated with the listed sender, "Carole Webber." The recipient address listed on **SUBJECT PARCEL 1** - "3042 E Bragstad Dr, Sioux Falls, SD 57103-4041" - appears to be a legitimate address but is not associated with the listed recipient, "Jarvis Smith."

b. **SUBJECT PARCEL 2** is a USPS Priority Mail parcel bearing tracking number 9505 5161 9121 5070 9721 37. **SUBJECT PARCEL 2** is a white colored, Priority Mail Medium Flat Rate Box. **SUBJECT PARCEL 2** has a handwritten label and does not contain a business account number. According to CLEAR database records, the return address listed on **SUBJECT PARCEL 2** - "7207 Rio Flora Pl, Downey, CA 90241" appears to be a legitimate address, but is not associated with the listed sender, "Claudia R." The recipient address listed on **SUBJECT PARCEL 2** - "2308 Grant St Apt.#1, Hollywood, FL 33020-3468" appears to be a legitimate address, but is not associated with the listed recipient, "Jimmy."

c. **SUBJECT PARCEL 3** is a USPS Priority Mail parcel bearing tracking number 9505 5161 9124 5070 19. **SUBJECT PARCEL 3** is a white colored, USPS Priority Mail Large Flat Rate Box. **SUBJECT PARCEL 3** has a handwritten label, all the seams are taped, and does not contain a business account number. According to CLEAR database records, the return address listed on **SUBJECT PARCEL 3** - "9330 Horley Ave, Downey, CA 90240" appears to be legitimate address, and is associated with the listed sender, "Sung Kim." The recipient address listed on

**SUBJECT PARCEL 3** - "5346 Cabot Creek Dr, Sugar Hill, GA 30578" appears to be a legitimate address, but is not associated with the listed recipient, "Ms. Huh Nan OK."

d. **SUBJECT PARCEL 4** is a USPS Priority Mail parcel bearing tracking number 9405 5362 0624 9293 5551 29. **SUBJECT PARCEL 4** is a brown colored, cardboard box. **SUBJECT PARCEL 4** does not contain a business account number, and all the seams are taped. According to CLEAR database records, the return address listed on **SUBJECT PARCEL 4** - "1127 S Spaulding Ave Unit 301, Los Angeles, CA 90019," appears to be legitimate address, but is not associated with the listed sender, "Marie Janine." The recipient address listed on **SUBJECT PARCEL 4** - "124 N West St, York, PA 17401-3363," appears to be a legitimate address, and is associated with the listed recipient, "Nic Quin."

e. **SUBJECT PARCEL 5** is a USPS Priority Mail parcel bearing tracking number 9405 5362 0624 9293 5551 74. **SUBJECT PARCEL 5** is a brown colored, cardboard box. **SUBJECT PARCEL 5** does not contain a business account number, and all the seams are taped. According to CLEAR database records, the return address listed on **SUBJECT PARCEL 5** - "1127 S Spaulding Ave Unit 301, Los Angeles, CA 90019" appears to be legitimate address, but is not associated with the listed sender, "Marie Janine." The recipient address listed on **SUBJECT PARCEL 5** - "6744 Burbage Landing Cir, Suffolk, VA 23435-3080" appears to be a legitimate address, and is associated with the listed recipient, "Javier Jones."

f. **SUBJECT PARCEL 6** is a USPS Priority Mail parcel

bearing tracking number 9505 5138 0668 5069 8326 90. **SUBJECT PARCEL 6** is a white colored, USPS Priority Mail Large Flat Rate Box. **SUBJECT PARCEL 6** has a handwritten label, does not contain a business account number, and all the seams are taped. According to CLEAR database records, the return address listed on **SUBJECT PARCEL 6** - "40-2923 Rd St, LIC, NY 11101" does not appear to be a legitimate address, and not associated with the listed sender, "Carlos M." The recipient address listed on **SUBJECT PARCEL 6** - "P.O. Box 2320, Mayaguez, PR 00681" appears to be a legitimate address, and is associated with the listed recipient, "Nidza."

g. **SUBJECT PARCEL 7** is a USPS Priority Mail parcel bearing tracking number 9505 5161 9124 5070 8083 96. **SUBJECT PARCEL 7** is a white colored, USPS Priority Mail Medium Flat Rate Box. **SUBJECT PARCEL 7** has a handwritten label and does not contain a business account number. According to CLEAR database records, the return address listed on **SUBJECT PARCEL 7** - "9330 Horley Ave, Downey, CA 90240," appears to be legitimate address, and is associated with the listed sender, "Sung Kim." The recipient address listed on **SUBJECT PARCEL 7** - "5346 Cabot Creek Dr, Sugar Hill, GA 30578" appears to be a legitimate address, but is not associated with the listed recipient, "Huh Nan Ok."

h. **SUBJECT PARCEL 8** is a USPS Priority Mail parcel bearing tracking number 9505 5145 5759 5070 6487 43. **SUBJECT PARCEL 8** is a white colored, USPS Priority Mail Large Flat Rate Box. **SUBJECT PARCEL 8** has a typed label, does not contain a business account number, and all the seams are taped. According

to CLEAR database records, the return address listed on **SUBJECT PARCEL 8** - "2383 Lincoln Park Ave, Los Angeles, CA 90031," appears to be legitimate address, and there is no listed sender. The recipient address listed on **SUBJECT PARCEL 8** - "9908 Shining Willow, Street Middleton, WI 53562" appears to be legitimate address, and there is no listed sender.

i. **SUBJECT PARCEL 9** is a USPS Priority Mail parcel bearing tracking number 9205 5903 4784 2730 0046 6575 03.

**SUBJECT PARCEL 9** is a white colored, USPS Priority Mail large Flat Rate Box. **SUBJECT PARCEL 9** does not contain a business account number. According to CLEAR database records, the return address listed on **SUBJECT PARCEL 9** - "305 N Coral Dr, Long Beach, CA 90803-2306" appears to be legitimate address, but is not associated with the listed sender, "125 Curiosity." The recipient address listed on **SUBJECT PARCEL 9** - "2305 Camelia Dr W, Statesboro, GA 30461-8040," appears to be legitimate address, and is associated with the listed sender, "Stacy Patterson."

C. **Drug-Detection Dog Alerts to the SUBJECT PARCELS**

15. On March 12, 2025, based on the suspicious characteristics of the SUBJECT PARCELS, South Gate Police Department Officer Antonio Mendez had his trained drug detection dog, "Otis," examine the exterior of the **SUBJECT PARCELS**. I learned from Officer Mendez that K9 Otis gave a positive alert to **SUBJECT PARCEL 1 through SUBJECT PARCEL 9** separately, indicating the presence of controlled substances or other items, such as the proceeds of controlled substances, which have been recently contaminated with the odor of controlled substances.

16. Attached hereto as Exhibit 1, which I incorporate fully herein by reference, are documents setting forth information provided by Officer Mendez regarding K9 Otis' training and history in detecting controlled substances, and the examination of **SUBJECT PARCELS 1 through 9.**

**V. TRAINING AND EXPERIENCE REGARDING EVIDENCE ASSOCIATED WITH DRUG TRAFFICKING AND MONEY LAUNDERING**

17. Based on my background, training, and experience, I am aware of the following:

a. Drug traffickers often maintain and exchange large amounts of United States currency in order to maintain and finance their ongoing drug trafficking businesses, which operate on a cash basis. Their illegal narcotics trafficking operations also require laundering money from the drug sales, often in the form of substantial amounts of cash.

b. Individuals who facilitate money laundering for drug trafficking operations may create companies that operate under the appearance of an entity conducting legitimate business to mislead banks that may otherwise decline to open their business accounts. Also, by doing so, subjects attempt to disguise their activity to avoid detection by law enforcement and bank regulators who may report their conduct to authorities.

c. Individuals who operate money transmitting businesses that fail to properly register may do so to facilitate money laundering, a crime, and therefore are less likely to follow required regulations for legitimate entities. Additionally, individuals involved in money laundering

facilitation may conceal their true identity from shipping entities and other third-party vendors to avoid being identified and prosecuted.

d. Based on my training and experience, and in view of the facts described above including that the **SUBJECT PARCELS** had inconsistent sender/recipient information, fully taped seams, and were alerted to by K9 Otis as containing the odor of narcotics, I believe that the parcels may contain narcotics, proceeds of narcotics transactions, or other evidence of narcotics transactions or distribution.

**VI. CONCLUSION**

18. For the reasons above, there is probable cause to believe that the **SUBJECT PARCELS**, as described in Attachment A, contain evidence, fruits, and instrumentalities of violations of Title 21, United States Code, Sections 841(a)(1) (distribution and possession with intent to distribute a controlled substance); 846 (conspiracy to distribute or possess with intent to distribute a controlled substance); and 843(b) (unlawful use of a communication facility, including the mails, to facilitate the distribution of a controlled substance), as described in Attachment B.

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone on this 14th day of March 2025.

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HONORABLE BRIANNA MIRCHEFF  
UNITED STATES MAGISTRATE JUDGE

# **EXHIBIT 1**

**AFFIDAVIT**

I, Antonio Mendez, being duly sworn, declare and state as follows:

I have been a Police Officer with the City of South Gate Police Department since May of 1997. I am currently assigned as a detective to the Narcotic and Special Problems Unit with my K-9 partner Otis. I have handled and/or assisted federal and state narcotics task forces with hundreds of controlled substance investigations. I have attended approximately 200+ hours of narcotic and investigative related classes; in addition to being a member in good standing with the California's Narcotic Officers Association.

In September 2020, Otis and I successfully completed an 80-hour formal training course conducted under the direction of Rodney Spicer of Gold Coast K9. Mr. Spicer has over 30 years of experience in handling and training narcotics detection canines and is a certified K9 evaluator under POST (Commission on Peace Officers Standards and Training). Otis' training certified him to alert to the presence of cocaine, methamphetamine, Fentanyl and heroin. I also conduct ongoing training on a monthly basis in various locations of interdiction, such as vehicles, truck tractor and trailers, schools, parcels, airports, storage units, residences, jails, motels, and apartments, as well as in various quantities of drugs. This training also includes controlled negative (blank) testing, in which all objects or locations have no contraband present and training with neutralizing odors which are common items associated with controlled substances, such as plastic bags, plastic gloves, and food. Otis was last certified on December 11, 2025.

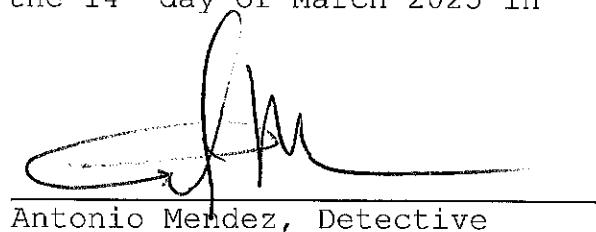
As of March 2025, Otis and I have completed over 560 hours of training. I am familiar and knowledgeable about the changes

in Otis's behaviors when he detects the presence of the odor of illegal controlled substances.

On Wednesday March 12, 2025 at approximately 1:20 PM, Otis and I responded to a request for narcotic detection K-9 at 1055 N. Vignes St. Los Angeles, CA. 90012. Otis alerted to the presence of scent of narcotics on or in the following Parcels

1. 9505 5161 9124 5070 8084 19
2. 9505 5138 0668 5069 8326 90
3. 9505 5161 9121 5070 9721 37
4. 9405 5362 0624 9293 5551 74
5. 9505 5145 5759 5070 6487 43
6. 9205 5903 4784 2730 0046 6575 03
7. 9505 5161 9124 5070 8083 96
8. 9405 5362 0624 9293 5366 78
9. 9405 5362 0624 9293 5551 29

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed at 10:30 AM on the 14<sup>th</sup> day of March 2025 in Los Angeles County.



\_\_\_\_\_  
Antonio Mendez, Detective